

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

19 CR 375 (SJ)

CHRISTIAN TRUNZ

Defendant.

-----X

**GOVERNMENT'S SIXTH UNOPPOSED MOTION  
TO CONTINUE THE DEFENDANT'S SENTENCING HEARING**

The United States of America respectfully submits this Fifth Unopposed Motion to Continue the Defendant's Sentencing Hearing and states as follows:

1. On August 20, 2019, the defendant pled guilty, pursuant to a plea agreement, to an information charging one count of conspiracy to engage in spoofing, in violation of 18 U.S.C. § 371, and one count of spoofing, in violation of 7 U.S.C. §§ 6c(a)(5)(C) and 13(a)(2).
2. The defendant is not in custody and was released on his own personal recognizance with conditions pending sentencing.
3. Sentencing in this matter is currently scheduled for October 28, 2021.
4. The defendant is cooperating with the Government and is expected to testify in an ongoing case in the Northern District of Illinois, which currently is scheduled for trial on July 5, 2022.
5. The Government respectfully requests that the sentencing hearing be continued for 6 months in order to allow the defendant to continue his cooperation.
6. The undersigned has conferred with counsel for the defendant. The defendant has no objection to the requested relief.

For the foregoing reasons, the government respectfully requests that the Court grant this Fifth Unopposed Motion to Continue the Defendant's Sentencing Hearing.

Dated: October 15, 2021

Respectfully submitted,

JOSEPH S. BEEMSTERBOER  
Acting Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

By: /s/Matthew F. Sullivan  
Matthew F. Sullivan  
Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice  
1400 New York Avenue NW  
Washington, DC 20005  
(202) 578-6583  
matthew.sullivan2@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 15, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and that the foregoing document is being served this day on all counsel of record via transmission of Notice(s) of Electronic Filing.

By: /s/Matthew F. Sullivan  
Matthew F. Sullivan